

EXHIBIT N

Vladimir Iakovlev, M.D.

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
3 AT CHARLESTON
4
5 IN RE: ETHICON, INC., Master File No.
6 PELVIC REPAIR SYSTEM PRODUCTS 2:12-MD-02327
7 LIABILITY LITIGATION MDL 2327
8 -----
9 THIS DOCUMENT RELATES TO CASE
10 CONSOLIDATION:
11 Terreski Mullins, et al., v.
12 Ethicon, Inc., et al.
13 Case No. 2:12-CV-02952
14 -----
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16
17 DEPOSITION OF
18 VLADIMIR IAKOVLEV, M.D.
19
20 * * * *
21 HIGHLY CONFIDENTIAL PORTION
22 * * * *
23
24 September 14, 2015
25 9:00 a.m. - 5:05 p.m.

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1 intentionally oxidized polypropylene by exposing it
2 to some chemical solution?

3 MR. ORENT: Objection.

4 THE WITNESS: Yes, he did.

5 BY MR. THOMAS:

6 Q. Did you ask him to have that mesh
7 so that you could determine whether this
8 intentionally oxidized polypropylene absorbed
9 stain?

10 MR. ORENT: Objection.

11 THE WITNESS: No.

12 BY MR. THOMAS:

13 Q. Why not?

14 MR. ORENT: Objection.

15 THE WITNESS: Because I'm doing my own
16 experiment and I believe I need to keep it for at
17 least a year and a half.

18 BY MR. THOMAS:

19 Q. Did you discuss with Dr. Guelcher
20 the scope of his experiment?

21 MR. ORENT: Objection. At this point,
22 Counsel, I think you're getting into -- I think you
23 need to clarify whether your questions are in the
24 context of litigation or research.

25 To the extent it's in litigation it's

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1 covered by privilege and I would instruct the
2 witness not to answer under the rules. But to the
3 extent that you're discussing research, I think
4 that's fair game to discuss.

5 BY MR. THOMAS:

6 Q. Okay. From a research
7 perspective, did you have any discussions with Dr.
8 Guelcher about his experiment?

9 A. It's work in progress so it's
10 privileged to researchers, I guess, at this point.

11 Q. Are you going to assert a
12 privilege for your research?

13 A. For research information, yes.

14 Q. Okay. And you asserted a
15 litigation privilege, which I don't think is
16 appropriate -- I'm not arguing with you. You said
17 there's no research privilege. Now he's trying to
18 assert a research privilege?

19 MR. ORENT: No, what I said was in
20 terms of legal -- in terms of legal privileges that
21 I can, that I have, that I have an attorney-client --
22 excuse me, a attorney work product under the Rule
23 26.

24 Rule 26 specifically allows for expert
25 witnesses to consult with one another under the

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1 CERTIFICATE OF REPORTER

2 CANADA)

3 PROVINCE OF ONTARIO)

4

5 I, Judith M. Caputo, the officer before whom the
6 foregoing deposition was taken, do hereby certify
7 that the witness whose testimony appears in the
8 foregoing deposition was duly sworn by me; that the
9 testimony of said witness was taken by me in
10 shorthand, using Computer Aided Realtime, to the
11 best of my ability and thereafter reduced to
12 written format under my direction; that I am
13 neither counsel for, related to, nor employed by
14 any of the parties to the action in which the
15 deposition was taken, and further that I am not
16 related or any employee of any attorney or counsel
17 employed by the parties thereto, nor financially or
18 otherwise interested in the outcome of the action.

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21

22 Judith M. Caputo, RPR, CSR, CRR

23

24 Commissioner for taking

25 Oaths in the Province of Ontario